

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:

**Jointly Administered under  
Case No. 08-45257**

Petters Company, Inc., et al.,  
Debtors.

Court File No. 08-45257

(includes:  
Petters Group Worldwide, LLC;  
PC Funding, LLC;  
Thousand Lakes, LLC;  
SPF Funding, LLC;  
PL Ltd., Inc.;  
Edge One LLC;  
MGC Finance, Inc.;  
PAC Funding, LLC;  
Palm Beach Finance Holdings, Inc.)

Court Files Nos.:  
08-45258 (GFK)  
08-45326 (GFK)  
08-45327 (GFK)  
08-45328 (GFK)  
08-45329 (GFK)  
08-45330 (GFK)  
08-45331 (GFK)  
08-45371 (GFK)  
08-45392 (GFK)

Chapter 11 Cases  
Judge Gregory F. Kishel

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Douglas A. Kelley, in his capacity as the  
court-appointed Chapter 11 Trustee of  
Debtors Petters Company, Inc. and  
PL Ltd., Inc.,

Plaintiff,

vs.

ADV. NO. 10-04396

Westford Special Situations Master Fund, L.P.;  
et al.,

Defendants.

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**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE OF NOTICES AND PAPERS**

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**PLEASE TAKE NOTICE** that, pursuant to 11 U.S.C. § 1109(b) and Rule 9010 of the Federal Rules of Bankruptcy Procedure, Bradley P. Thoreson of Foster Pepper PLLC, located at the address listed below, hereby enters his appearance *pro hac vice* in the above-captioned

adversary proceeding as counsel for Epsilon Global Active Value Fund II, Ltd. (“Epsilon II Feeder Fund”), a defendant in the above-captioned adversary proceeding.

Pursuant to Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy Procedure, the undersigned requests that an entry be made on the Clerk’s Matrix in this case, and that all notices given or required to be given and all papers served or required to be served in this case by the Debtor, the Court or any other party in interest be given to and served upon:

Bradley P. Thoreson  
Foster Pepper PLLC  
1111 Third Avenue, #3400  
Seattle, Washington 98101  
Phone: (206) 447-4400  
Fax: (206) 447-9700  
Email: [thorb@foster.com](mailto:thorb@foster.com)

**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, statement of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone facsimile transmission, telegraph, telex, or otherwise filed or made in this case.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and Request for Service of Notices and Papers has been filed in compliance with the requirements of this Court’s order of January 21, 2011 and this Notice of Appearance and Request for Services of Notices and Papers shall not be deemed or construed as a consent to jurisdiction or as a waiver of any applicable right of the Epsilon II Feeder Fund to: (1) to have final orders in noncore matters entered only after *de novo* review by a United States District Court Judge; (2) a trial by jury in

any proceedings so triable in these cases or any case, controversy, or proceedings related to these cases; (3) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, setoffs, or recoupments to which Epsilon II Feeder Fund is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Epsilon II Feeder Fund expressly reserves.

Dated: March 4, 2011

FOSTER PEPPER PLLC

By: /s/ Bradley P. Thoreson

Bradley P. Thoreson (*pro hac vice*)

1111 Third Avenue, #3400

Seattle, Washington 98101

Phone: (206) 447-4400

Fax: (206) 447-9700

Email: [thorb@foster.com](mailto:thorb@foster.com)

*Counsel to Epsilon Global Active Value Fund II,  
Ltd.*

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Defendants.

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**CERTIFICATE OF SERVICE**

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I, Brenda Bole, certify that on March 4, 2011, I caused the Notice of Appearance and Request for Service of Notices and Papers of Bradley P. Thoreson to be filed electronically with the Clerk of Court through ECF, and served by automatic email notification to each person or

entity named on the Electronic Mail service list pursuant to the Electronic Case Filing System and this constitutes service or notice pursuant to Local Bankruptcy Rule 9000-1(a).

I further certify that I caused a copy of the foregoing document to be served upon the following persons by placing a true and correct copy thereof in an envelope and arranging for the deposit of same, postage prepaid, via the United States Mail, addressed as follows: N/A

Dated: March 4, 2011

/e/ Brenda Bole  
Brenda Bole  
Legal Assistant  
Foster Pepper PLLC  
1111 3<sup>rd</sup> Avenue, Suite 3400  
Seattle, WA 98101